

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

MARY SEGUIN,

*Plaintiff,*

VS.

Civil Action No. 1:23-cv-00034

RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES in its official capacity; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA CABALLEROS and TIMOTHY FLYNN in their individual and official capacities; GERO MEYERSIEK,

*Defendants*

**PLAINTIFF'S AFFIDAVIT FOR ENTRY OF DEFAULT**

MARY SEGUIN, hereby declares under penalty of perjury, pursuant to 28 U.S.C. sec. 1746(2) that the following statements are true and correct:

1. I hereby make application to the Clerk of this Court for entry of default as to the defendants Rhode Island Office of Child Support Services, Kevin Tighe, Monique Bonin, Frank DiBiase, Wendy Fobert, Karla Caballeros, and Timothy Flynn, pursuant to Rule 55(a), Federal Rules of Civil Procedure, and in support of this application do show that:
  - a. The aforesaid defendants were served by the Rhode Island Sheriff with copies of Plaintiff's Summons and Complaint as provided by Rule 4, Federal Rules of Civil Procedure;
  - b. Upon Plaintiff's information and belief, the aforesaid defendants are neither infants nor incompetent persons requiring special service in accordance with Rule 4(g), Federal Rules of Civil Procedure, and are not serving with the armed forces of the United States entitled to the protection of 50 U.S.C. App. Section 520;

- c. The aforesaid defendants have neither answered nor otherwise defended the Plaintiff's Summons and Amended Complaint, and the time to do so, as provided in Rule 12(a), Federal Rules of Civil Procedure, has expired;
- d. Copies of this Affidavit and the Request for Entry of Default, which are being filed herewith, have this date been served upon the aforesaid defendants electronically by email notice.

Respectfully submitted,

Date: March 1, 2023

MARY SEGUIN

\_\_\_\_\_/s/ *Mary Seguin*

Mary Seguin

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